**MEMO ENDORSED**

**U.S. Department of Justice**

*United States Attorney*
*Southern District of New York*

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*86 Chambers Street*
*New York, New York 10007*

February 28, 2024

VIA ECF

Hon. Dale E. Ho
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Application **GRANTED.**  The parties shall file the required letter by **April 1, 2024.**  The Government's deadline to answer, move, or otherwise respond to the Complaint is **ADJOURNED**, *sine die.*  So Ordered.

Dale E. Ho                    Dated: February 29, 2024
U.S. District Judge      New York, New York

**Re:** ***Marek Jacek Wozniak v. Alejandro Mayorkas, et al.***, No. 23 Civ. 11256 (DEH)

Dear Judge Ho:

This Office represents the government in this action, in which Plaintiff seeks judicial review of the denial of his application for naturalization pursuant to 8 U.S.C. § 1421(c).  This Office was served with the summons and the complaint on January 29, 2024, resulting in a response deadline of March 29, 2024.  *See* Fed. R. Civ. P. 12(a)(2).  On February 8, 2024, the Court entered a scheduling order directing the parties to file a joint status letter and proposed case management plan by March 1, 2024.  ECF No. 12.  I write to respectfully request a 30-day extension of that deadline (i.e., to April 1, 2024).  This extension would allow this Office sufficient time to discuss the matter the client agency in advance of the deadline to respond to the complaint and then would allow the parties to have more productive discussions before filing a joint status letter and proposed case management plan.  This is the government's first extension request, and Plaintiff consents to this extension request.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc:  Counsel of record (via ECF)